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## **EXHIBIT B**



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January 31, 2006

## By FAX (206-622-7485) and First-Class Mail

James L. Phillips, Esq. Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352

Re:

Hearts On Fire Company, LLC v. EightStar Diamond Company, et al.

## Dear Jim:

At the December 6, 2005 30(b)(6) deposition of EightStar Diamond Company ("EightStar") by its designated representatives Richard and Dana Von Sternberg, I requested that your client search for certain documents identified during the course of the deposition. You asked that I make a formal request for such documents, which I am doing by this letter:

- 1) Spectrum Gems' sales records that provide information about persons who purchased EightStar diamonds directly because they were outside the geographic area of authorized EightStar retailers;
- 2) Records of EightStar retailer reimbursement requests for advertising expenditures spent on advertising EightStar diamonds;
- 3) Records and/or invoices depicting amounts EightStar paid to Mr. Brad Huisken for providing individualized training sessions to EightStar dealers;
- A copy of the e-mail from Peter Yantzer to Richard Von Sternberg dated in or about June 1996 in which Mr. Yantzer writes that he believes EightStar diamonds are "the most perfectly cut diamonds on the planet";
- 5) Copies of all versions of the EightStar PMSA Relationship Selling Program manual; and



James L. Phillips, Esq. January 31, 2006 Page 2

6) Copies of all videotaped recordings of the EightStar dealer conferences including, but not limited to, the 2003 and 2005 tapes and any others that were not destroyed.

Please let me know as soon as possible if you object to producing any of the documents listed above. Should you have any questions, please do not hesitate to contact me at the above number.

Very truly yours

Robert P. Sherman

RPS:btj